

EXHIBIT 18

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, <i>et al.</i> ,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Case No. 1:18-CV-68
	§	
UNITED STATES OF AMERICA, <i>et al.</i> ,	§	
	§	
Defendants,	§	
	§	
and	§	
	§	
KARLA PEREZ, <i>et al.</i> ,	§	
	§	
Defendant-Intervenors,	§	
	§	
and	§	
	§	
STATE OF NEW JERSEY,	§	
	§	
Defendant-Intervenor.	§	

DECLARATION OF ALEJANDRA ÁVILA

I, Alejandra Ávila, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am currently a staff attorney at the Mexican American Legal Defense and Education Fund (MALDEF), counsel for Defendant-Intervenors, Karla Perez, *et al.* (“Defendant-Intervenors”) in this action. I submit this declaration in support of Defendant-Intervenors’ Motion to Compel Discovery from Plaintiff State of Texas and to Dismiss all Other Plaintiff States in the above-referenced case.

2. I am thoroughly familiar with the facts and arguments in this proceeding. I have personal knowledge of the statements contained in this declaration and am fully competent to testify to the matters set forth herein.

3. On June 11, 2018, in response to Defendant-Intervenors' first set of discovery requests, Plaintiffs produced 10 documents bates stamped STATE000001-52. Specifically, Plaintiffs produced : (1) a chart from the Texas Education Agency from February 2018; (2-4) three publicly available reports from the Department of Homeland Security (DHS) titled "Estimates of the Unauthorized Immigrant Population Residing in the United States" as of January 2006, 2011, and 2012; (5) a 2006 report from the Texas Office of the Comptroller titled "Undocumented Immigrants in Texas: A Financial Analysis of the Impact of the State Budget and Economy;" (6) a public report from the U.S. Department of Health and Human Services, Office of Refugee Resettlement, showing the total number of unaccompanied minors released to sponsors from October 2014-January 2018 by state; and (7-10) four charts which appear to relate to Texas school finance.

4. On June 14, 2018, in response to Defendant-Intervenors' second set of discovery requests, Plaintiffs produced 6 documents bates stamped STATE0000053-66. Specifically, Plaintiffs produced: (1) a chart from the 2016 American Community Survey for Texas showing the total number of U.S. citizens and undocumented immigrants in the state as of 2016; (2-5) four Excel spreadsheets with no description; and (6) a publicly available report from DHS titled "Estimates of the Unauthorized Immigrant Population Residing in the United States: January 2014."

5. On June 18, 2018, in response to Defendant-Intervenors' third set of discovery requests, Plaintiffs produced documents bates stamped STATE0000067-249, which included the expert reports of Dr. Donald Deere and Dr. Lloyd Potter attached to Plaintiffs' motion for preliminary injunction, the CVs of those experts, and publicly available articles and documents

related to those expert reports. Plaintiffs provided supplemental expert disclosures on June 25, 2018.

6. On June 29, 2018, in response to Defendant-Intervenors' fourth set of discovery requests, Plaintiffs produced five Excel sheets bates stamped STATE0000250-54.

7. Plaintiffs did not produce any documents in response to Defendant-Intervenors' fifth set of discovery requests.

I declare under penalty of perjury pursuant to 28 U.S.C § 1746 that the foregoing is true and correct to the best of my knowledge. Executed in San Antonio, Texas on May 14, 2019.


Alejandra Avila